

# **EXHIBIT A**

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**From:** Bryan Tyson <btyson@taylorenghish.com>  
**Sent:** Friday, August 7, 2020 6:58 PM  
**To:** Robert McGuire; Conaway, Jenna B.; 'Bruce Brown'; 'Cary Ichter'; 'Alexander Denton'; Bryan Jacoutot; 'Brian Lake'; Marilyn Marks; 'cheryl.ringer@fultoncountyga.gov'; 'Carey Miller'; 'david.lowman@fultoncountyga.gov'; 'dbrody@lawyerscommittee.org'; 'erosenberg@lawyerscommittee.org'; 'hknapp@khlawfirm.com'; 'Josh Belinfante'; 'jpowers@lawyerscommittee.org'; 'kaye.burwell@fultoncountyga.gov'; 'sparks@khlawfirm.com'; 'vrusso@robbinsfirm.com'; 'Cate Berenato'; Loree Anne Paradise; 'Melanie Johnson'; Hedgecock, Lyle F.; Miriyala, Arvind S.; Cross, David D.  
**Subject:** RE: Curling v. Raffensperger - Second Joint Requests for Production to State Defendants

**External Email**

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Robert:

We have answered your questions, indicated what is feasible, and explained why, in addition to these reasons, expedited discovery is neither appropriate nor necessary.

Have a great weekend,

Bryan



**Bryan P. Tyson**

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**From:** Robert McGuire <ram@lawram.com>

**Sent:** Friday, August 7, 2020 5:13 PM

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**Subject:** RE: Curling v. Raffensperger - Second Joint Requests for Production to State Defendants

Bryan,

We don't read today's Order (Doc. 768) as vacating the Judge's previous instruction to us all (given on Wednesday) to confer over the expedited discovery and to bring disputes to her at the start of next week. So we disagree that our expedited discovery is somehow overtaken by this Order. On the contrary, one reason she gave for entering this Order was because we will be producing new evidence through our expedited discovery.

We therefore still need your responses in advance of our discussion with the Judge early next week. You told us yesterday that you'd have at least some of those responses today. Please confirm we are still on track.

Best,  
Robert McGuire

ROBERT A. MCGUIRE, III

\*\*\* NOTE NEW CONTACT DETAILS BELOW \*\*\*

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**From:** Bryan Tyson <[btyson@taylorenglish.com](mailto:btyson@taylorenglish.com)>

**Sent:** Friday, August 7, 2020 12:04 PM

**To:** Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>; 'Bruce Brown' <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; 'Cary Ichter' <[Clichter@ichterdavis.com](mailto:Clichter@ichterdavis.com)>; 'Alexander Denton' <[Alexander.Denton@robbinsfirm.com](mailto:Alexander.Denton@robbinsfirm.com)>; Bryan Jacoutot <[bjacoutot@taylorenglish.com](mailto:bjacoutot@taylorenglish.com)>; 'Brian Lake' <[Brian.Lake@robbinsfirm.com](mailto:Brian.Lake@robbinsfirm.com)>; 'cheryl.ringer@fultoncountyga.gov' <[cheryl.ringer@fultoncountyga.gov](mailto:cheryl.ringer@fultoncountyga.gov)>; 'Carey Miller' <[carey.miller@robbinsfirm.com](mailto:carey.miller@robbinsfirm.com)>; 'david.lowman@fultoncountyga.gov' <[david.lowman@fultoncountyga.gov](mailto:david.lowman@fultoncountyga.gov)>; 'dbrody@lawyerscommittee.org' <[dbrody@lawyerscommittee.org](mailto:dbrody@lawyerscommittee.org)>; 'erosenberg@lawyerscommittee.org' <[erosenberg@lawyerscommittee.org](mailto:erosenberg@lawyerscommittee.org)>; 'hknapp@khlawfirm.com' <[hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com)>; 'Josh Belinfante' <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; 'jpowers@lawyerscommittee.org' <[jpowers@lawyerscommittee.org](mailto:jpowers@lawyerscommittee.org)>; 'kaye.burwell@fultoncountyga.gov' <[kaye.burwell@fultoncountyga.gov](mailto:kaye.burwell@fultoncountyga.gov)>; 'sparks@khlawfirm.com' <[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)>; 'vrusso@robbinsfirm.com' <[vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com)>; 'Cate Berenato' <[Cate.Berenato@robbinsfirm.com](mailto:Cate.Berenato@robbinsfirm.com)>; Loree Anne Paradise <[lparadise@taylorenglish.com](mailto:lparadise@taylorenglish.com)>; 'Melanie Johnson' <[melanie.johnson@robbinsfirm.com](mailto:melanie.johnson@robbinsfirm.com)>; Hedgecock, Lyle F. <[LHedgecock@mofo.com](mailto:LHedgecock@mofo.com)>; Miriyala, Arvind S. <[AMiriyala@mofo.com](mailto:AMiriyala@mofo.com)>; Robert McGuire <[ram@lawram.com](mailto:ram@lawram.com)>; Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>

**Subject:** RE: Curling v. Raffensperger - Second Joint Requests for Production to State Defendants

All:

We have reviewed the RFPs we discussed yesterday with our clients. We will provide the protocol for beginning the forensic examination of the memory cards no later than Monday.

Now that there are no preliminary-injunction motions pending and we are near enough to the election that any relief under new motions for preliminary injunction would be barred by the *Purcell/RNC* line of cases, we do not believe that

any expedited discovery is needed in this case and we can continue on a normal discovery track. Further, after reviewing the requests we discussed yesterday with our clients, the staffing and workload of the election division is absorbed in the operations of the elections, making it nearly impossible to allocate the resources necessary to provide the scope of documents you are seeking on an expedited basis.

If you still plan to seek expedited discovery of any additional materials, we will need to have the issue of the expedited discovery resolved by the Court.

Thanks,

Bryan



**Bryan P. Tyson**

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**From:** Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>

**Sent:** Thursday, August 6, 2020 12:08 PM

**To:** 'Bruce Brown' <[bbrown@brucepbrownlaw.com](mailto:bbrown@brucepbrownlaw.com)>; 'Cary Ichter' <[Clichter@ichterdavis.com](mailto:Clichter@ichterdavis.com)>; 'Alexander Denton' <[Alexander.Denton@robbinsfirm.com](mailto:Alexander.Denton@robbinsfirm.com)>; Bryan Jacoutot <[bjacoutot@taylorenghish.com](mailto:bjacoutot@taylorenghish.com)>; 'Brian Lake' <[Brian.Lake@robbinsfirm.com](mailto:Brian.Lake@robbinsfirm.com)>; 'cheryl.ringer@fultoncountyga.gov' <[cheryl.ringer@fultoncountyga.gov](mailto:cheryl.ringer@fultoncountyga.gov)>; 'Carey Miller' <[carey.miller@robbinsfirm.com](mailto:carey.miller@robbinsfirm.com)>; 'david.lowman@fultoncountyga.gov' <[david.lowman@fultoncountyga.gov](mailto:david.lowman@fultoncountyga.gov)>; 'dbrody@lawyerscommittee.org' <[dbrody@lawyerscommittee.org](mailto:dbrody@lawyerscommittee.org)>; 'erosenberg@lawyerscommittee.org' <[erosenberg@lawyerscommittee.org](mailto:erosenberg@lawyerscommittee.org)>; 'hknapp@khlawfirm.com' <[hknapp@khlawfirm.com](mailto:hknapp@khlawfirm.com)>; 'Josh Belinfante' <[Josh.Belinfante@robbinsfirm.com](mailto:Josh.Belinfante@robbinsfirm.com)>; 'jpowers@lawyerscommittee.org' <[jpowers@lawyerscommittee.org](mailto:jpowers@lawyerscommittee.org)>; 'kaye.burwell@fultoncountyga.gov' <[kaye.burwell@fultoncountyga.gov](mailto:kaye.burwell@fultoncountyga.gov)>; 'sparks@khlawfirm.com' <[sparks@khlawfirm.com](mailto:sparks@khlawfirm.com)>; 'vrusso@robbinsfirm.com' <[vrusso@robbinsfirm.com](mailto:vrusso@robbinsfirm.com)>; 'Cate Berenato' <[Cate.Berenato@robbinsfirm.com](mailto:Cate.Berenato@robbinsfirm.com)>; Loree Anne Paradise <[lparadise@taylorenghish.com](mailto:lparadise@taylorenghish.com)>; 'Melanie Johnson' <[melanie.johnson@robbinsfirm.com](mailto:melanie.johnson@robbinsfirm.com)>; Hedgecock, Lyle F. <[LHedgecock@mofo.com](mailto:LHedgecock@mofo.com)>; Miriyala, Arvind S. <[AMiriyala@mofo.com](mailto:AMiriyala@mofo.com)>; 'ram@lawram.com' <[ram@lawram.com](mailto:ram@lawram.com)>; Bryan Tyson <[btyson@taylorenghish.com](mailto:btyson@taylorenghish.com)>; Cross, David D. <[DCross@mofo.com](mailto:DCross@mofo.com)>; Conaway, Jenna B. <[JConaway@mofo.com](mailto:JConaway@mofo.com)>

**Subject:** Curling v. Raffensperger - Second Joint Requests for Production to State Defendants

Counsel,

Attached please find Plaintiffs' Second Joint Request for Production of Documents and Inspection of Things on an expedited basis. We look forward to discussing these requests with you this afternoon at 3:30. We do not seek expedited treatment of joint RFPs 1-8 served on August 3.

Please use the Zoom Meeting information below:

Topic: Curling v. Raffensperger

Time: Aug 6, 2020 03:30 PM Eastern Time (US and Canada)

Join Zoom Meeting

<https://mofo.zoom.us/j/95236308056?pwd=d2J0WlB5N3hTY2lrbjQxWEtlcEFZdz09>

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Passcode: 327989

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Thanks,

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